

The European-American Business Organization, Inc., is a New York based consulting business that assists U.S. companies exporting to Europe or setting up entities in the EU. It also helps companies from abroad coming to the United States whether they want to export or set up their own operations here. The clients of EABO are primarily small and medium-sized businesses. As president and CEO I represent EABO as a member of the U.S. delegation at the biannual U.S.-EU Best Practices Workshop for Small and Medium-Sized Businesses under the auspices of the TEC.

EABO is respectfully submitting comments regarding the proposed TTIP

In general, EABO has experienced that its clients are companies with limited personnel resources. They usually do not have an export or international sales department. However, they want to take advantage of the opportunities that are offered to them in today's global markets. Over the last two years we have noticed a definite increase of U.S. small and medium-sized companies that are looking at exporting to Europe. This development coincides with the implementation of the President's National Export Initiative and is very likely encouraged by the NEI.

Our clients run into many of the same issues that the larger companies also face. But due to their limited resources they cannot devote as much time and human capital to resolving many of the issues as larger companies are able to do. Not one of our clients has an office in the Washington, D.C. area. When they run into an issue they turn to us and ask us for resolving it, if possible.

Bureaucratic measures that are not justified because of product safety regulations, safety and security measures as such, or necessary product specific provisions and regulations are especially burdensome to SMEs and should certainly be reviewed. Companies that have the approval for their products from regulators in the U.S. would welcome it, if the EU would accept such approval for the products in Europe.

For many business executives crossing borders is a tedious and time-consuming process. The idea of having to wait at a border crossing in line for one or two hours as it does happen on occasion can hold people back from engaging in economic activities. Furthermore, visa and work permit issues can be very discouraging. There are problems and issues on both sides of the Atlantic. Relatively frequently we are looking at the issue of obtaining work permits for U.S. citizens that plan to work in European countries, especially when their commercial activity includes longer periods of work in several countries. Easing some visa restrictions and a less tedious approval process for business people would certainly help in increasing economic activity.

First steps have been taken in the right direction. Further significant improvements for the business traveler or executive and an expansion of the current program would be very welcome. In the U.S., Global Entry is a U.S. Customs and Border Protection (CBP) program that allows expedited clearance for pre-approved, low-risk travelers upon arrival in the U.S. Global Entry is open to U.S. citizens and lawful permanent residents, Dutch citizens (reciprocity), and Mexican nationals. For Canadian citizens and residents there is the opportunity to obtain Global Entry benefits through membership in the NEXUS program. Expanding this program to include more individuals who qualify would certainly be very helpful. A number of countries in Europe seem to have expressed an interest in joining the program lately.

For frequent travelers from the EU to the U.S. and also from the U.S. to the EU and expansion of the Global Entry System and the already existing European systems would be very helpful to reduce waiting times at the point of entering the respective country. The system should be expanded to also include non-immigrant visa holders and also frequent travelers that have established a flawless record from visa waiver countries.

Nobody likes to wait, and especially not when one has been on a long flight on a crowded plane and is tired. Lines in

Europe at points of entry at major airports can also be long. A faster processing procedure for pre-screened and approved individuals sends a positive message and creates an 'open for business' image.

Another idea in this context is the expansion of the system of U.S. immigration preclearance at the airport of departure. Currently, the U.S. system of immigration preclearance in the Americas covers airports in Canada and the Caribbean. In Europe it is only set up at the Irish airports of Shannon and Dublin.

What is sometimes referred to as the energy revolution in the U.S. and is very likely to bring energy independence to our country by no later than 2020 will lead to a large number of manufacturing companies from Europe considering new production facilities in the U.S. This will mean new jobs for American workers. Some of the executives at these new plants may at the beginning come from Europe and will need appropriate visas.

In this context I favor a special visa category similar to the E-3 Certain Specialty Occupation Professionals Visa that applies to Australian nationals. 10,500 visas are available per U.S. fiscal year. The total number of people in Australia is 22,620,600. Applying the same ratio to the 503,492,041 inhabitants of the EU, the total number of E-3 Certain Specialty Occupation Professionals visas for the European should be 233,710. That number may be too large. However, any realistic number should exceed the total current H-1B, E and L visa applications from Europe to open the door for the increase due to the increasing demand by EU manufacturing companies that will plan to open sites in the U.S.

In many European countries young people have great opportunities through vocational education and training. They learn their skills from experienced and well-educated craftsmen. The U.S. does not to have such a system. While the training in Europe is focused on improving the skills of the young people, the service aspects of the running of a business where such a skills can be used have not gotten as much attention in Europe. While Europe is also moving towards becoming a service oriented economy it is still lagging behind the U.S.

My suggestion is to establish a program which would allow young workers the opportunity to do an internship abroad at a facility where they can participate in training their manual and technical skills and also learn to run a service-oriented business. Such an exchange program may send the participants to a foreign country for about to six months. However, the experience that they will acquire will be extremely valuable for their future careers. With the skills that they have obtained abroad, these people will be much better qualified to have improved career opportunities. They may advance faster in the company that they are working for or may set up their own business because they have additional skills that their colleagues don't have. Such a system would bring some skills of the vocational system that is very successful in some of the EU member states also to young Americans. The program may be organized at the level of business organizations, the unions, chambers of commerce or other business and industrial organizations. This will give young people who don't attend a university a much improved outlook for their work life. It will provide them with a greater opportunity to go into business by themselves and hire younger people that they can train in turn.

If deemed necessary, I would be available to testify at the hearing on May 29 and 30 and elaborate on the above items.

Respectfully submitted

New York, May 10, 2013  
Sven C. Oehme

Sven C. Oehme, LL.M. (Fordham Law School)  
President and CEO  
European-American Business Organization, Inc.  
405 Lexington Avenue, 37th Fl.  
The Chrysler Building  
New York, NY 10174  
Tel: +1 212 972 3035 Fax: +1 212 972 3026

Email: [oehme@eabo.biz](mailto:oehme@eabo.biz)  
Website: [www.eabo.biz](http://www.eabo.biz)